

LOVELLS LLP  
Matthew P. Morris, Esq.  
590 Madison Avenue  
New York, New York 10022  
Telephone: (212) 909-0600  
Facsimile: (212) 909-0660

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In re:

LEHMAN BROTHERS HOLDING INC., et. al.,	:	Chapter 11
Debtors.	:	Case No. 08-13555 (jmp)
	:	(Jointly Administered)
	X	

**SECOND AMENDED VERIFIED STATEMENT OF LOVELLS LLP  
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Lovells LLP ("Lovells") as attorneys for the entities listed on Exhibit A hereto (collectively, the "Entities"), in connection with the above-captioned chapter 11 cases of Lehman Brothers Holdings Inc., and its debtor affiliates (collectively, the "Debtors"), makes this Second Amended Statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure:

1. Lovells has been retained by the Entities in connection with the Debtors' cases.
2. Each of the Entities holds claims against and/or interests in various Debtors arising at various times pursuant to agreements with the Debtors, and/or under statutory and/or common law and/or at equity. The Entities may also hold additional claims against and/or interests in the Debtors that do not fall within the scope of Lovells' representation of such Entities.
3. The specific nature and amounts of the claims held by the Entities have been set forth in proofs of claim filed against the relevant Debtors' estates.
4. The following are the facts and circumstances in connection with Lovells' employment in these cases. Lovells represented certain of the Entities or their affiliates in

matters unrelated to Lehman prior to the commencement of the Debtors' chapter 11 cases and each of the Entities separately requested that Lovells represent them in connection with issues and claims generated by the filing of the Debtors' chapter 11 cases.

5. Lovells also represents or advises, or may have represented or advised, other parties in interest with respect to these cases that have not been included in this Statement because such parties have not instructed Lovells to appear in these cases on their behalf. These parties in interest may include commercial and investment banks, hedge funds, and other financial institutions and parties to various agreements with the Debtors.

6. In the past, Lovells provided certain legal services to certain of the Debtors or their affiliates. In this respect, Lovells has filed claims against Lehman Brothers Holdings, Inc. In addition, Lovells may at some future time seek to have its fees and disbursements paid by the Debtors' estate pursuant to the Bankruptcy Code. Upon information and belief, Lovells does not hold any equity interest in the Debtors.

7. Lovells reserves the right to supplement or amend this Statement in the future.

8. The undersigned declares under penalty of perjury that the statements made herein are true and accurate, to the best of his knowledge, information and belief.

Dated: New York, New York  
January 08, 2010

By: /s/ Matthew P. Morris  
Matthew P. Morris, Esq  
Lovells LLP  
590 Madison Avenue  
New York, New York 10022  
Tel: (212) 909-0600  
Fax: (212) 909-0660  
Matthew.morris@Lovells.com

**EXHIBIT A**

<u>Creditor</u>	<u>Address</u>
Standard Chartered Bank	1 Madison Avenue, 3rd Floor New York, NY 10010
Lloyds TSB Bank plc	1251 Avenue of the Americas, 39th Floor New York, NY 10020
QVT Financial, LP	1177 Avenue of the Americas New York, NY 10036
BRE Bank S.A.	ul. Senatorska 18 00-950 Warszawa, P.O. Box 728
MP Bank hf	Skipholti 50d 105 Reykjavik, Iceland
VBS Investment Bank	Borgartun 26, 6th Floor 105 Reykjavik, Iceland
SABMiller plc	One Stanhope Gate London W1K 1AF, United Kingdom
The Seaport Group LLC	360 Madison Avenue New York, NY 10017
Ente Nazionale di Previdenza ed Assistenza per gli Psicologi	Via Andrea Cesalpino, 1 00161 Roma Italy
Ente di Previdenza e Assistenza Pluricategoriale	Via Vicenza, 7 00185 Roma Italy
Fondo Pensioni per il Personale del Creditor, Fondiario S.p.A.	VIA Cristoforo Colombo, 80 00147 Roma Italy
KM Immobilienservice GmbH	Erlerstrasse 7 6020 Innsbruck Austria
Deka FundMaster Investmentgesellschaft MbH	Hahnstrasse 55 60528 Frankfurt Germany
Centerbridge Credit Partners Master, L.P.	375 Park Avenue New York, NY 10152

Centerbridge Special Credit Partners  
L.P. 375 Park Avenue  
New York, NY 10152

International Fund Management, S.A. 3, rue des Labours  
1912 Luxembourg  
Luxembourg

Banco Pastor Cantón Pequeño nº1, 6<sup>a</sup> Planta  
15003 - A CORUÑA

Tegean Master Fund LTD 140 East 45th Street  
New York, NY 10017

Martin Currie China 'A' Share Fund  
Limited Washington Mall I  
22 Church Street  
Hamilton HM11  
Bermuda

Phoenix Life Limited 1 Wythall Green Way  
Wythall, Birmingham B47 6WG

The Bank of New York Mellon 6525 West Campus Oval  
New Albany, Ohio 43054